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9 Attorneys for Defendant Monique Burns
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12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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16 UNITED STATES OF AMERICA,

No. CR 3-12-mj-70126 MEJ

17 Plaintiff,

18 v.
19 MONIQUE BURNS,
20 Defendant.

UNOPPOSED MOTION TO MODIFY
RELEASE CONDITIONS;
ORDER MODIFYING CONDITIONS OF
RELEASE

21 By and through counsel, defendant Monique Burns respectfully requests that her release
22 conditions in this case be modified, as follows:

23 1. The defendant is permitted to travel to Anaheim, California for a period of five
24 days – July 12, 2012 through and including July 16, 2012.

25 2. **All other conditions will remain in effect.**

26 The reason for this request for a modification of travel restrictions is that Ms. Burns
27 would like to accompany her teenage son to a basketball tournament in Anaheim California. Ms.

1 Burns has been a parent volunteer on her son's basketball team for the past several years.

2 Historically, she has traveled with him to his various tournaments and events.

3 Ms. Burns has rented a car for this trip – the make, model and license plate of the vehicle
4 they are using will be provided to Pretrial Services. While in Anaheim, she will be staying at
5 Lemon Tree Hotel, located at 1600 E. Lincoln Ave, phone number (714) 772-0200.
6

7 Pretrial Services Officer Betty Kim has been contacted, and she has no opposition to this
8 modification. In addition, United States Attorney Kevin Barry has been contacted, and he has no
9 objection to the request, given the approval of Pretrial Services.
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11 The undersigned, Camellia Baray, declares under penalty of perjury that the foregoing is
12 true and correct to the best of her information and belief.
13

14 Dated: July 10, 2012

15 Respectfully submitted,
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17 BONJOUR, THORMAN,
18 BARAY & BILLINGSLEY,
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20 /S/
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22 CAMELLIA BARAY
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17 UNITED STATES OF AMERICA,

No. CR 3-12-mj-70126 MEJ

18 Plaintiff,

v.

19
20 ~~PROPOSED~~ ORDER MODIFYING
21 CONDITIONS OF RELEASE

22 MONIQUE BURNS,

23 Defendant.
24 _____ /
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28 Based on the approval of the parties and good cause appearing therefore, it is

ORDERED that the defendant's release conditions be modified as follows:

1. The defendant be permitted to travel to Anaheim, CA from July 12, 2012 to July
16, 2012.

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31 Unopposed Motion to Modify Release Conditions
32 And Proposed Order
33 No. CR 3-12-mj-70126 MEJ

1 2. All other conditions will remain in effect.

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3 Dated: July 10, 2012

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5 The Honorable Maria-Elena James
6 United States Magistrate Judge



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